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Attorneys for Defendant  
Chex Systems, Inc. (erroneously sued as “Chexsystems”)

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

CAROL ODINMA, } CASE NO.: 3:15-cv-05592  
Plaintiff, }  
vs. }  
JP MORGAN CHASE BANK, N.A., }  
CHEXSYSTEMS, and DOES 1-100, }  
Defendant. }

1 TO THE CLERK OF THE ABOVE-ENTITLED COURT:

2 PLEASE TAKE NOTICE that defendant Chex Systems, Inc. (erroneously sued  
3 as “Chexsystems”) (“Defendant”) hereby removes to this Court the state court action  
4 described below.

5 1. On June 24, 2015, a complaint was filed against Defendant by plaintiff  
6 Carol Odinma (“Plaintiff”), in an action pending in Superior Court of the State of  
7 California in and for the County of Alameda, entitled *Carol Odinma vs. JP Morgan*  
8 *Chase Bank, N.A., ChexSystems*, Case No. RG15775378. A copy of the state court  
9 complaint (“Complaint”) is attached hereto as **Exhibit A**.

10 2. On October 9, 2015, Plaintiff filed a First Amended Complaint. A copy of  
11 the First Amended Complaint (“FAC”) and other documents that were served on  
12 Defendant are attached hereto as **Exhibit B**.

13 2. This removal petition is timely under 28 U.S.C. § 1446(b) because  
14 Defendant was not served with the Complaint and was served with the FAC on  
15 November 9, 2015, as reflected on the Service of Process transmittal that is attached  
16 hereto as **Exhibit C**.

17 3. This action is a civil action of which this Court has original jurisdiction  
18 under 28 U.S.C. § 1331 and which may be removed to this Court by Defendant  
19 pursuant to the provisions of 28 U.S.C. § 1441(a), because the FAC asserts claims  
20 against Defendant arising under, 15 U.S.C. §§ 1681, *et seq.* (the “Fair Credit  
21 Reporting Act”), 28 U.S.C. §§ 1692, *et seq.* (the “Fair Debt Collection Practices  
22 Act”), and 15 U.S.C. §§ 6801(a). *See* Ex. A, ¶¶ 57-64, and 66.

23 4. As the FAC was filed in the Superior Court of the State of California,  
24 County of Alameda, venue in this District Court is proper. *See* 28 U.S.C. § 1441(a)  
25 (providing for removal “to the district court of the United States for the district and  
26 division embracing the place” where the state court action is pending);  
27 28 U.S.C. § 84(b) (The Northern District comprises the counties of, *inter alia*,  
28 Alameda).

1       5.     Defendant is represented by the undersigned.

2       6.     Defendant JP Morgan Chase Bank, N.A. consents to removal of this

3 action. A true and correct copy of the consent form is attached hereto as **Exhibit D**.

4       7.     Attached hereto as **Exhibits E through O** are true and correct copies of

5 Complaint Civil Cover Sheet, Complaint, Summons on Complaint, Notice of

6 Assignment to Judge For All Purposes, Initial Case Management Conference, First

7 Amended Complaint, Case Management Statement of Carol Odinma, Proof of

8 Service of Summons for Complaint, Case Management Order, Doe Amendment of

9 Complaint, and Proof of Service of Summons for First Amended Complaint,

10 respectively, which were filed in the Superior Court of the State of California in and

11 for the County of Alameda, in the action entitled *Carol Odinma vs. JP Morgan*

12 *Chase Bank, N.A., ChexSystems*, Case No. RG15775378.

14 DATED: December 8, 2015

SIMMONDS & NARITA LLP  
JEFFREY A. TOPOR  
JENNIFER L. YAZDI

17 By: /s/Jennifer Yazdi  
18 Jennifer L. Yazdi  
19 Attorneys for Defendant  
20 Chex Systems, Inc.  
21 (erroneously sued as "Chexsystems")